



PROPOSED DEVELOPMENT OF AN ELECTRICAL CONNECTION BETWEEN THE APPROVED PRIORY FARM SOLAR ARRAY AND WYMONDLEY SUBSTATION, HERTFORDSHIRE

Planning Statement

Prepared for



AGR Solar 4 Ltd

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1.0 INTRODUCTION AND BACKGROUND

1.1 Introduction

1.1.1 This Planning Statement supports a detailed planning application which has been submitted to North Hertfordshire District Council (NHDC) by AGR Solar 4 Limited (the Applicant), for the development of an electrical connection between the approved Priory Farm Solar Array and National Grid's Wymondley Substation, Hertfordshire.

1.1.2 This introductory section describes the context for the Proposed Development, provides a brief description of the scheme itself, and describes the full structure and content of the Planning Statement and the overall application.

1.2 Context to the Development Proposal

1.2.1 Planning permission for the Priory Farm Solar Array was resolved to be granted by NHDC (application reference: 21/03380/FP) on 22nd November 2022 but the application was called-in by the Secretary of State (SoS) for determination. Following a call-in inquiry the development was approved on 11th March 2024 (appeal reference: APP/X1925/V/23/3323321).

1.2.2 The Priory Farm Solar Array scheme comprises the construction and operation of a photovoltaic solar array with associated battery storage and ancillary development on land at Priory Farm, located to the north and east of the village of Great Wymondley, North Hertfordshire.

1.2.3 The approved scheme included for a grid connection cable to National Grid's Wymondley Substation off Blakemore End Road, St Ippolyts. The approved cable runs from Priory Farm Solar Array, west along Graveley Lane, before heading south along Priory Lane. The approved cable route then runs west along Stevenage Road, before heading south down Blakemore End Road west along Sperberry Hill, and then north into Wymondley Substation.

1.2.4 During the public inquiry, concerns were raised with regards to road closures, the potential traffic management arrangements and temporary diversions that would result from the construction of the approved cable route.



- 1.2.5 The likely methodology of the contractors carrying out the cable-laying works was discussed at length during the inquiry. Similarly, the processes that would need to be adhered to by the appointed contractor were also discussed at length, including a Section 50 license application with the Local Highway Authority (LHA) and the discharging of a Construction Traffic Management Plan (CTMP) condition with the Local Planning Authority (LPA).
- 1.2.6 Ultimately, whilst the potential impacts associated with the construction of the approved cable route were deemed to be acceptable by the Inspector and Secretary of State, and therefore did not form a reason to resist the grant of planning permission, the Applicant is still cognisant of local concerns.
- 1.2.7 This planning application is therefore being brought forward for an amended grid connection cable route, to avoid the use of Graveley Lane, Priory Lane, Blakemore End Road and Sperberry Hill. This approach would prevent the need for any full road closures. Due to its constrained width, the approved cable route would have resulted in the need for a temporary closure of the Priory Lane and Graveley Lane sections of the route.
- 1.2.8 The amended route, whilst still utilising part of the highway network (Stevenage Road), would result in considerably less disruption than the currently approved route. The affected section of Stevenage Road could be kept open during the works, with one-way signalised traffic controls employed to safely manage the flow of vehicles. This would greatly reduce the impact and further minimise disruption to local residents and businesses.

1.3 The Proposal

- 1.3.1 The proposal comprises circa 1.9km of underground electricity cable which would be installed from the approved Priory Farm Solar Array to National Grid's Wymondley Substation.
- 1.3.2 The underground cable installation would comprise 2no. HV cable circuits and 1no. fibre cable circuit. The cables would be wholly buried underground, within a trench that would be 900-1350mm deep and 900mm wide. Once installed the Proposed Development would be entirely underground and not visible, with the highway reinstated as per New Road and Street Works Act 1991 (NRSWA) requirements. The cable route is shown on drawing 3656-01-003a-c General Arrangement Rev A.



- 1.3.3 As described in Section 2.0 subsequently, the cable route would run through a variety of land uses including agricultural fields, greenfield land, woodland, public highway, road verge, footpath, and would also cross Ash Brook (watercourse) in two locations.

1.4 This Document

- 1.4.1 This document is the Planning Statement submitted in support of the Proposed Development of the Priory Farm Solar Array amended grid connection cable route. It is sub-divided into 4 main Sections, following on from this introduction. Section 2.0 describes the development proposals in detail, whilst Section 3.0 provides an appraisal of the environmental effects of the scheme. Section 4.0 sets out the relevant planning policy context. Finally, Section 5.0 draws some concise conclusions.

- 1.4.2 The technical appendices that support this Planning Statement and summarised within Section 3.0 of this Planning Statement are:

- Appendix A - Ecological Assessment;
- Appendix B – Arboricultural Impact Assessment;
- Appendix C - Heritage Impact Assessment; and
- Appendix D – Transport Statement.

- 1.4.3 The Planning Statement is submitted in support of the overall planning application which also comprises:

- The requisite planning application forms, certificates and statutory fees; and
- A set of planning application drawings comprising:
 - Site Location Plan (Ref: 3656-01-001);
 - Statutory Plan (Ref: 3656-01-002a-c Rev A);
 - General Arrangement (Ref: 3656-01-003 a-c Rev A); and
 - Cable Trench Details (Ref: 3656-01-004)



2.0 THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 This Section of the Planning Statement describes the development proposals and the main construction methods. The penultimate sub-section describes the construction phase of the development, with the final sub-section briefly describing the operational phase of the project.

2.2 Proposed Development

2.2.1 The development is linear in nature and comprises circa 1.9km of underground electricity cables (comprising 2no. HV cable circuits and 1no. fibre cable circuit) running from the approved Priory Farm Solar Array to National Grid's Wymondley Substation.

2.2.2 The proposed cable route would lie entirely within the red line boundary illustrated on the Statutory Plan (drawing ref: 3656-01-002a-c Rev A). The cables would be wholly buried underground. The majority of the cables would be laid within a trench 900mm wide and 900-1350mm deep. Horizontal Directional Drilling (HDD) would be used to install the cable conduits which cross Ash Brook, as well as the area of woodland to the west of Wymondley Substation (as shown on drawing ref: 3656-01-003a-c Rev A).

2.2.3 The grid connection cable route begins at the southern edge of the approved Priory Farm Solar Array site within an agricultural field. The cables then route in a generally south western direction, along the western perimeter of the agricultural field, where it meets Stevenage Road. The route then heads along Stevenage Road until it reaches the Stevenage Road / Arch Road / Blakemore Road roundabout. The cable route then runs south west along a footpath (the 'Ippollitts 016' Public Right of Way) parallel to Ash Brook, before heading south beneath an area of woodland to reach Wymondley Substation. The cable route then enters the substation compound on its western side.

2.2.4 The applicant will apply for a licence under Section 50 of the NRSWA for all works within the public highway.



2.3 Construction Phase

Construction Methods

- 2.3.1 The proposed cable installation has been categorised by one of a number of descriptors:
- i. **Soft Dig:** this involves trenching in non-hard surfaced media, typically including roadside verges, fields and areas of grass.
 - ii. **Hard Dig:** this involves trenching in hard surfaced media, typically including roads and impermeable surfaced paths.
 - iii. **Watercourse and Woodland Crossing:** this involves HDD beneath the relevant feature, with a drill entry and exit point and associated cable draw pits.
- 2.3.2 Construction details for the cable trenching are shown on drawing ref: 3656-01-004. This drawing illustrates that each cable line would typically be made up of 2no. trefoil cable duct groups (i.e. 3no. cables per duct) and 1 fibre cable duct. A cable warning tile would be located above each cable line.
- 2.3.3 The majority of the route would comprise Soft and Hard Dig where the cables would be laid within a mechanically excavated trench circa 900-1350mm deep and 900mm wide. The top of the cable conduits would be 600-1050mm below ground. The trench would be backfilled and the existing surface treatment, whether hard or soft, fully reinstated. Broken trench techniques would be utilised where the cable crosses the hedgerow running along the southern boundary of the approved Priory Farm Solar Array site. This would involve hand digging the cable beneath the hedgerow to avoid its removal.
- 2.3.4 The cable conduit would be installed using HDD when crossing Ash Brook, and when crossing the large area of woodland to the west of Wymondley Substation. This requires no trenching, and the cable would be installed at a greater depth beneath the specific constraint. The launch and receive pits for HDD would be 3m x 2m x 1.2m.
- 2.3.5 The construction methodology for the HDD works is set out below:
- i. A pit would be excavated at the launch and reception points. The pit will be fenced off using double clipped Heras fencing.
 - ii. HDD equipment would be transported to the launch pit via low loader lorry.



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- iii. The lorry would be parked within a safe working area for offloading of the drilling rig. The drill will be off loaded by one operator, whilst a second operator acts as a banksman guiding the drill down the lorry ramps. Another two operatives will be present to monitor any other pedestrian or vehicle movement.
 - iv. The drilling rig will be sited at the launch pit.
 - v. The grid connection cable route will be cat scanned prior to works proceeding.
 - vi. The launch pit will be excavated and drill rig situated behind pit. The drill operator will then rotate the drill string to check operation.
 - vii. Water will be added to the mixing system to start mixing the necessary mud mix.
 - viii. The drill head tracker engineer will perform background checks for interference and the location hand-set will select the 2 lowest best frequencies to overcome background interference.
 - ix. A battery powered sonde is placed in the drill head and calibrated to 3m using the location hand set.
 - x. The drill operator pushes the pilot rods into the ground at the pre-agreed drill angle (based on the location of existing utility services).
 - xi. The steering engineer will then check the position of the drill head from the locator unit. This process is repeated during the pilot bore to keep the drill on course for the completion of the bore.
 - xii. During the pilot operation, drilling fluid will be used to transport spoil, as well as to support and lubricate the bore path. The drilling fluid will be monitored to ensure that there are constant returns to the excavated pits, thus reducing hydraulic pressure within the bore. Due to the need to drill under a watercourse, the drill design has been undertaken to give acceptable cover to the product pipe below the watercourse as required.
 - xiii. The drilling creates a bore in which a product pipe can be installed.
 - xiv. The boring technique is a closed system such the material excavated at the head is passed back along the bore by a drill fluid that is designed also to seal the bore. The seal prevents the permeation of the fluid into the surrounding ground such that there is no effect on the character of the surrounding ground. Besides the physical seal that the fluid creates along the bore, it has an operating head within the bore that balances any groundwater pressures within the natural ground.



- xv. Upon completion of the pilot bore the drill head will be removed and replaced with a back reamer to enlarge the bore, this will be continued in stages until the bore is of an acceptable size to accept the product pipe.
- xvi. The directional drill rig operator will pull the rods back towards the launch pit.
- xvii. The pipes to be installed will then be attached to the final reamer and pulled into the bore.
- xviii. As pipes enter the bore, drilling slurry is displaced and flows back to the exit and then entry pits.
- xix. A tractor and bowser will collect drilling slurry from the exit pit and deposit it into the entry pit for recycling prior to reuse.
- xx. All wet arisings from the operation will be removed and disposed of by tanker.
- xxi. The pipes to be installed are then butt welded and strung out away from the exit pit in a straight line.

2.3.6 Adequate trench / excavation support equipment would be used during the excavation of the pits. Once the cables are jointed, all trench / excavation support equipment would be removed, the excavation would be backfilled, and the area reinstated to existing ground levels and required specification.

2.3.7 When crossing, running parallel to, or working in the vicinity of any Public Right of Way, a banksman will be present to guide pedestrians past the works as necessary. No works will be left incomplete and would be surrounded by a barrier at all times.

Construction Programme

2.3.8 In total, the construction period is expected to last around 8 to 10 weeks, depending on weather conditions. Construction activities would take place 6 days per week, during the following hours:

- i. Monday to Friday 08:00 – 18:00; and
- ii. Saturday 08:00 – 13:00.

2.3.9 No construction activities shall take place at any time on Sundays or bank holidays.

Operational Phase

2.3.10 Once the construction phase of the project is complete, there would be no operational phase activities. Accordingly, it is demonstrably the case that no material planning issues arise with regards to the long-term operation of the scheme. The cables would



be maintained by an appropriate contractor via a long term operation and maintenance contract.



3.0 PLANNING / ENVIRONMENTAL ISSUES

3.1 Introduction and Environmental Context

3.1.1 Planning and environmental matters relevant to the Proposed Development were identified through a desk study. The key desk study information sources were:

- Google Earth satellite imagery.
- Statutory nature conservation designations were identified via MAGIC, a multi-agency geographical information system for ecological data sets.
- Non-statutory nature conservation designations were identified via the NHDC website.
- Heritage information was obtained via MAGIC which identifies all statutory heritage designations such as Listed Buildings, Scheduled Monuments etc.
- Conservation areas were identified via the NHDC Local Plan Map.
- Flood zones were identified via the Flood Map for Planning website.
- All other relevant planning designations were identified via the NHDC Local Plan Map.

3.1.2 Based upon the nature of the development, including the methods of installation of the cables outlined in the previous section, and the outcome from the desk study review; the following planning and environmental matters fall to be considered as part of the determination of this planning application:

- Green Belt;
- Flood Risk;
- Ecology and nature conservation;
- Arboriculture i.e. the protection of trees;
- Heritage and archaeology; and
- Traffic and transport.

3.1.3 This section of the Planning Statement considers all the aforementioned matters.

3.2 Green Belt

3.2.1 The NHDC Policies Map identifies that the majority of the Site is located within the Green Belt. A small section of the Site, along Stevenage Road, is located within the Little Wymondley Settlement Boundary. An assessment of the proposal against



Green Belt policy is included within Section 4 of this Planning Statement. It concludes that due to the underground nature of the Proposed Development, it would not have any impact on the Green Belt.

3.3 Flood Risk

3.3.1 A review of the Government's Flood Map for Planning website reveals that the cable route crosses Flood Zones 1, 2 and 3.

3.3.2 The Proposed Development would not result in any increase in the amount of hardstanding area on the Site and would be located wholly underground. As such, given the nature of the development, it would not have any impact on flood risk.

3.4 Ecology and Nature Conservation

3.4.1 A detailed assessment of the likely ecological effects of the cable installation has been undertaken and is provided as Appendix A to the Planning Statement. The conclusions of the assessment are provided below.

3.4.2 An extended habitat survey was initially undertaken on the 16th, 17th and 18th of April 2024, with an update walkover undertaken on the 16th of July 2024. Ground Level Tree Assessment, Badger Survey and Water Vole and Otter Surveys were also undertaken during the April visits.

3.4.3 The survey area does not form part of any statutory designated sites. Furthermore, no direct or indirect impacts on statutory designated sites for nature conservation are anticipated by virtue of separation distance, the restricted scale and nature of the Proposed Development and lack of functionally linked land.

3.4.4 The survey area does contain one non-statutory designated site; Wymondley Substation Local Wildlife Site (LWS). Direct impacts are anticipated at Wymondley Substation LWS to facilitate the new cable installation, however, the impact is small in size and will be mitigated for via the implementation of a soil management plan.

3.4.5 The majority of the Site is open mosaic habitat, hardstanding and grazed modified grassland. Smaller areas of woodland, mixed scrub, lowland meadow, modified grassland, arable field margin and hedgerow with trees are also present. A soil management plan will be implemented in areas of open mosaic habitat, lowland meadow and arable field margin, to mitigate impacts on these habitat types. Standard



measures to protect retained trees, ensure runoff control and pollution prevention will also be implemented; these measures will safeguard habitats on and immediately surrounding the Site.

- 3.4.6 Ash Brook is present within the red line boundary in two locations, and runs adjacent to it for a long section, however in this area, a public footpath is also present. HDD is to be implemented underneath areas of Ash Brook, woodland and mixed scrub, avoiding any impacts on these habitats. Broken trench techniques will be implemented to install the cable beneath the hedgerow located along the southern boundary of the approved Priory Farm Solar Array site, avoiding the requirement for any hedgerow removal.
- 3.4.7 The Proposed Development is exempt from Biodiversity Net Gain (BNG) requirements due to the temporary nature of any impacts. All habitats are classed as being retained within the Biodiversity Metric.
- 3.4.8 Bird nesting habitat of woodland, mixed scrub and hedgerow on Site will be retained. There is some limited potential for ground nesting birds nesting within the open mosaic habitat, lowland meadow and arable field margins to be affected by the construction of the development, however, these areas are small in size. Vegetation works should be undertaken outside of the bird breeding season (1st March to 31st August inclusive). If vegetation works are necessary during the breeding season, suitable nesting habitat should be inspected by a suitably experienced ecologist prior to works commencing. Only when the ecologist is satisfied that no offence will occur under the legislation will works be permitted to proceed.
- 3.4.9 Numerous trees with potential bat roosting habitat were identified on or near the Site boundary, however no trees are to be removed to facilitate site works and they will be protected during construction. Construction works are extremely unlikely to cause any significant disturbance to bat roosts that may be present in nearby trees. All land being lost to the proposals is temporary in nature and will have negligible impacts on foraging and commuting bats. Valuable bat habitats including mature trees, hedgerows and Ash Brook beyond the Site boundaries will be retained and protected during construction. In addition, any lighting required during construction and / or operation of the cable route would be directed away from boundary features.
- 3.4.10 No badger setts were identified within or immediately adjacent to the Site, however not all areas within 30m of the red line boundary were able to be extensively searched



due to dense vegetation present. A pre-construction badger survey should be completed by a suitably qualified ecologist immediately prior to the commencement of development to check for any newly constructed setts surrounding the Site. If an active badger sett is identified within proximity to development, then a mitigation strategy will be produced and if necessary, works in proximity to a sett will only proceed under a licence from Natural England.

- 3.4.11 Ash Brook provides sub optimal habitat for foraging and / or commuting water vole and no presence was identified during the water vole survey. Works surrounding the brook would be undertaken via HDD, therefore, in the unlikely event water vole is present, impacts would be negligible. Ash Brook also has negligible suitability for otter due to sluggish flowing water, low water levels and lack of prey items. Standard pollution prevention measures will be employed to ensure runoff control and pollution prevention to protect the off-site brook sections (and consequential indirect impacts on water vole) which lie adjacent to Site.
- 3.4.12 Great Crested Newt (GCN) are known to be in the wider area. No ponds are located within the red line boundary, however four are within 250m. No ponds will be affected by the proposals and Natural England's Rapid Risk Calculator shows that an offence is highly unlikely to occur due to the size of the proposed cable route. The Site does support some reptile suitable habitat, however, no records were returned in the data search and the areas of habitat to be affected is small. As a precaution, Reasonable Avoidance Measures's (RAMS) will be undertaken in the areas of longer suitable habitat if works commence in spring or summer. This involves mowing areas of longer vegetation in a two stage cut; first to a height of 100-150mm above ground, then down to ground level prior to construction works, which will encourage any potential reptiles and amphibians to move away from the works area to safety.
- 3.4.13 Small amounts of habitats suitable for hazel dormouse are present on the Site, however HDD is being used to install the cable beneath woodland and mixed scrub, and broken trench techniques beneath the native hedgerow with trees on Site. No further measures are necessary concerning hazel dormouse.
- 3.4.14 The majority of hedgehog suitable habitat will be retained and protected. Longer areas of grassland should initially be removed under RAMs. RAMs should be implemented in areas of hedgehog suitable habitat as identified above for GCNs and



reptiles. Standard measures to protect a variety of wildlife such as covering excavations overnight must also be implemented.

3.4.15 No invasive non-native plant species listed under Schedule 9 of The Wildlife & Countryside Act 1981 (as amended) were recorded along or around the proposed cable route during the survey. Should any invasive species be encountered on Site prior to or during construction, the advice of a suitably qualified ecologist should be sought and the appropriate measures taken.

3.4.16 In light of the above, it is concluded that with the implementation of mitigation as set out above, the Proposed Development would not result in any unacceptable adverse impacts relating to local ecology or nature conservation, on or adjacent to the Site.

3.5 Arboriculture

3.5.1 A tree survey of the cable route has been undertaken and Arboricultural Impact Assessment provided at Appendix B to the Planning Statement. The conclusions of this report are provided below.

3.5.2 A tree survey and assessment of existing trees was carried out by FPCR Environment and Design on the 15th and 16th February 2024 in accordance with guidance contained within British Standard 5837:2012 'Trees in Relation to Design, Demolition and Construction - Recommendations' (hereafter referred to as BS5837). A total of thirteen individual trees, sixteen groups of trees, three woodlands and one hedgerow were surveyed. The Tree Survey Plan is shown on drawings 12256-T-01 to 12256-T-05.

3.5.3 The proposed cable route passes a diverse collection of deciduous and coniferous species, with over half of the surveyed material being graded as high and moderate quality. Much of the material was mature roadside planting, or groups of trees and woodland forming riparian planting and screening features. There were no Veteran or Ancient trees or woodland located on or adjacent to the Site.

3.5.4 The Proposed Development would not result in the need to remove any trees, woodland or hedgerows due to the combination of the following construction methods along the route:

- Mechanically excavated trench;



- Routing of the cable trench to make use of existing gaps in tree cover where possible;
- Trenchless HDD solutions; and
- Broken trench / hand digging techniques.

3.5.5 In light of the above, it is concluded that the Proposed Development would not result in any unacceptable adverse impacts relating to trees on or adjacent to the Site.

3.6 Heritage

3.6.1 A Heritage Impact Assessment has been undertaken and provided within Appendix C of the Planning Statement. The conclusions of the assessment are summarised below.

3.6.2 The Proposed Development is for the installation of a cable route which would require the excavation of a narrow trench with limited wider ground works. Potential impacts on known or unknown buried archaeological remains, which may survive, relate to the possibility of disturbing, removing, or destroying in situ remains and artefacts during works above and below ground (including excavation, construction and other works associated with the development) on the Site. The nature of the Proposed Development has the potential for a high magnitude of impact to occur but only in a limited area, not the entire Site, therefore creating a relatively minimal impact across much of the footprint of the Proposed Development.

3.6.3 Part of Little Wymondley Village is located within an Archaeologically Sensitive Area as recorded in the Historic Environment Records (HER) suggesting the likelihood of remains to be encountered within the Site would be High, however the Proposed Development will follow the existing route along Stevenage Road in this location, which has undergone historic disturbance therefore, the potential for any archaeological remains would be lower as well as the importance of those remains.

3.6.4 The settlement remains associated with Sperberry Hill Road have been found to extend into the southwest corner of the Site and similar remains may survive within the western area of the Site associated with the settlement. Much of the southwest corner of the Site has been heavily disturbed by upstanding trees, elevated / landscaped terrain, and recent developments in connection with the Wymondley Substation. As such, the potential for any surviving prehistoric to medieval remains associated with the Sperberry Hill settlement extending within the Site would be Low.



- 3.6.5 Given the frequency and density of other prehistoric remains recorded within the 1km Study Area, there is considered to be a Medium potential for further remains of likely Low Importance of this date to be encountered within the western and eastern areas of the Site. There is also considered to be a Low potential for further remains of Low Importance of this date to be encountered along Stevenage Road due to historic disturbance relating to the construction of the road and surrounding buildings.
- 3.6.6 Material recovered through fieldwork undertaken to the south of Site, indicates the location of a possible farmstead or other Roman structure which may suggest Roman activity extending within the Site. The proximity of the possible Roman cremation cemetery circa 350m to the north of the Site also suggests an elevated potential for further associated cremated remains to be present within the Site. However, it might be assumed that the Roman cemetery, along with the Roman cremation cemetery north of Great Wymondley, would have been located at the edges of the Roman settlement at Great Wymondley and as such, the Site is located in the hinterland. As such, there is considered a Medium potential for Roman remains to be encountered within the Site. Any Roman remains within the Site are considered most likely to be agricultural in nature and of Low Importance.
- 3.6.7 There is considered to be a Medium potential for medieval remains of Medium Importance such as those associated with the Grade II Listed medieval Boro Cottages. Cropmarks of small enclosures, ditches, ridge and furrow, and general disturbance indicative of medieval settlement have been recorded within the area surrounding the northeast corner of the Site near to the precinct of the Priory. Geophysical survey within the approved Priory Farm Solar Array site also indicates the possibility of medieval settlement remains. Therefore, medieval remains associated with the precinct of Wymondley Priory and / or adjacent settlements may extend within the boundaries of Site where such remains are most likely to relate to the enclosure and cultivation of the Priory lands in the medieval period. There is considered to be a Low potential for agricultural medieval remains of potential Low to Medium importance to survive on the Site. Any such remains would likely include cultivation remains, enclosures or historically recorded farms.
- 3.6.8 Considering the findspot of the Tudor coins hoard and 'Gravel Pit' along with the presence of eight post-medieval Listed Buildings identified along Stevenage Road, there is a judged to be High potential for post-medieval remains of Medium Importance not relating to agriculture to be encountered along Stevenage Road.



However, given the proposed route of the grid connection cable within the highway, the potential for substantial post-medieval remains of Medium importance to be encountered along Stevenage Road would be considered to be Low. No direct impacts are anticipated on the Listed Buildings along Stevenage Road.

- 3.6.9 The presence of several post-medieval farms surrounding the Site within the 1km Study Area suggests a Medium potential for post-medieval agricultural remains to be present on Site, with any such surviving remains considered likely to be of Low Importance.
- 3.6.10 There is considered to be a Low potential for modern remains with the exception of agricultural remains within the Site. Any surviving agricultural remains are considered likely to be of Low Importance.
- 3.6.11 The National Planning Policy Framework (NPPF) and its accompanying Planning Practice Guide (PPG), as well as local planning policies, require a mitigation response that is designed to take cognisance of the possible impacts upon heritage assets by a Proposed Development and avoid, minimise or offset any such impacts as appropriate.
- 3.6.12 The NPPF states that a local planning authority should require developers to 'record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact'. Given the archaeological potential of the Site, it is advised that NHDC, as advised by the Hertfordshire Historic Environment Advisory Service at Hertfordshire County Council, may request further archaeological works to be undertaken in advance of development. In view of the nature of the Proposed Development, if further works are deemed to be required, it may be most appropriate for geophysical survey to be undertaken in the less disturbed areas of the Site. It is advised that any mitigation measures should take into account the relatively minimal impact of the Proposed Development. The detailed requirements of archaeological mitigation would be determined by NHDC as advised by the Hertfordshire Historic Environment Advisory Service at Hertfordshire County Council and the scope set out in a Written Scheme of investigation (WSI) agreed by all parties prior to works commencing.
- 3.6.13 In the event of significant archaeological remains being encountered, then the Hertfordshire Historic Environment Advisory Service at Hertfordshire County Council may require further work including an archaeological excavation followed by post-

excavation analysis and reporting. Should any nationally important remains be identified, then the design of the Proposed Development may need to be amended to ensure their preservation.

- 3.6.14 In light of the above, it is concluded that with the implementation of the identified mitigation strategy, the Proposed Development would not result in any unacceptable adverse impacts relating to heritage and archaeology, on or adjacent to the Site.

3.7 Traffic and Transport

- 3.7.1 A Transport Statement (TS) has been produced to support the planning application and is contained within Appendix D to this Planning Statement. The conclusions of this report are summarised below.
- 3.7.2 The TS outlines the planning history that has resulted in the Applicant proposing an alternative cable route for the electrical grid connection. Whilst the potential impacts associated with the original cable route were deemed to be acceptable by both the Inspector and Secretary of State reviewing the call-in inquiry (ref: APP/X1925/V/23/3323321), and so did not form a valid reason to resist the grant of planning permission, the Applicant was nonetheless cognisant of the local concerns and potential disruption.
- 3.7.3 Construction-related traffic would access the site directly from Stevenage Road, Blakemore End Road or Little Wymondley by-pass (for the Wymondley Substation end of the cable works) or Priory Lane (for the short 650m eastern section of cable). Construction traffic for Stevenage Road and Blakemore End Road will leave the strategic road network at Junction 8 of the A1(M) and for Priory Lane it would leave at Junction 9 of the A1(M) via the A505 and B197 via Graveley Lan.
- 3.7.4 Construction traffic for the western end of the cable route can also route along A602 Little Wymondley Bypass from Junction 8 of the A1(M) to gain access to Stevenage Road without routing through the centre of Little Wymondley.
- 3.7.5 The preferred route options to / from the site are shown on the indicated HGV route plan illustrated in Image 4.1 of the TS.
- 3.7.6 Analysis of accident data within the study area indicates that no accidents have been recorded on the local highway network with the most recently available 5-year period.



It is not considered that there is an existing highway safety issue that might be exacerbated by the Proposed Development.

3.7.7 The TS provides commentary on the traffic generation of the construction phase, which would take place over an 8-10 week period depending on weather conditions. The construction process will only require a mini JCB for the excavation of spoil, a grab wagon for the transportation of spoil to / from an off-site storage area, a couple of work vans for the transportation of construction workers and tools to / from the Site, the occasional curtain sided lorry for the delivery of cabling and the occasional tipper for the delivery of sand fill. Due to the limited number of vehicles required during the construction-phase, the Proposed Development will not result in a noticeable increase in traffic generation to the area.

3.7.8 Having regard to the above, it is therefore concluded that there can be no highway or transport reasons to withhold planning permission for the scheme.

3.8 Minimising Disruption During Construction

3.8.1 This planning application has come forward with the key aim of reducing disruption during construction by completely avoiding Priory Lane, Blakemore End Road and Sperberry Hill along the grid connection cable route. Thus, removing the need for any full road closures during the construction phase of the development.

3.8.2 The mitigation measures proposed to further alleviate disruption during the construction phase of the development are detailed below:

- Where the proposed cable route falls within the public highway boundary of trafficked vehicular routes (i.e. Stevenage Road), temporary one-way traffic system managed by traffic-lights will be implemented. This method is a common industry-standard approach when conducting road works. Although one-way traffic systems cause minor disruption and delays to journeys, it will not result in the need for total road closures or diversions that result in severances.
- Vehicles delivering or removing materials from the Site will be required to enter the confines of the temporary construction barricades in order to load / unload. This is to ensure that construction activity will not interfere with the temporary one-way traffic system in place.

- When crossing, running parallel to, or working in the vicinity of any Public Right of Way, a banksman will be present to guide pedestrians past the works as necessary. No works will be left incomplete and would be surrounded by a barrier at all times.
- A Construction Management Plan will be submitted and approved by NHDC, prior to the commencement of development, which will set out all of the measures proposed to ensure that disruption during the construction phase of the development is kept to a minimum.

4.0 PLANNING APPRAISAL

4.1 Introduction

4.1.1 This section of the Planning Statement sets out the planning context relevant to the determination of the planning application and provides a brief appraisal of the Proposed Development against that context.

4.1.2 In terms of identifying relevant planning policy and material planning considerations, it is important to understand the nature of the Proposed Development and what it would deliver. In short, it is an essential element of the approved Priory Farm Solar Array scheme, that would deliver renewable, clean energy to the electrical grid. The benefits of this are:

- Assisting in the delivery of the essential clean energy generating infrastructure and reductions in greenhouse gas emissions required to mitigate the UK's contribution to climate change;
- Contributing to achieving the anticipated requirement for solar PV by 2030, set out within National Grid's Future Energy Scenarios report, in order to achieve net zero by 2050;
- Reducing the UK's requirement to import fossil fuels from less secure sources;
- Increasing the UK's power generation capacity in a decentralised energy generating station, and therefore contributing to the country's future energy requirements for a number of decades to come; and
- Creating employment opportunities.

4.1.3 These development characteristics and benefits must be borne in mind when identifying the policy context and undertaking a planning appraisal of the Proposed Development.

4.2 Planning Policy Context

Development Plan Policy

4.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.



4.2.2 In the case of the Proposed Development, the statutory Development Plan comprises:

- North Hertfordshire Local Plan 2011-2031 (November 2022);
- Wymondley Parish Neighbourhood Plan (September 2019);
- Hertfordshire Minerals Local Plan Review 2002-2016 (March 2007); and
- Hertfordshire Waste Development Framework, comprising:
 - Waste Core Strategy & Development Management Policies Development Plan Document 2011-2026 (November 2012); and
 - Waste Site Allocations Development Plan Document 2011-2026 (July 2014).

4.2.3 NHDC are currently undertaking a review of North Hertfordshire Local Plan 2011-2031. According to the Council's Local Development Scheme (LDS) (November 2022), an early review was scheduled to be undertaken by the end of 2023, however, this has not yet been progressed. The Local Plan Review has therefore not been considered any further.

4.2.4 Furthermore, the Proposed Development does not relate to waste or mineral development and there are no waste allocations or mineral safeguarding zones covering the Site. As such, the Minerals Local Plan, Waste Core Strategy and Development Management Policies, and Waste Site Allocations Document are not relevant to the determination of the planning application and are not considered further.

North Hertfordshire Local Plan 2011-2031 (November 2022)

4.2.5 The North Hertfordshire Local Plan 2011-2031 (NHLP) is accompanied by a Proposals Map, which identifies that the part of the Site along Stevenage Road is located within the Little Wymondley Settlement Boundary, with the remaining parts to the east and west located entirely within the Green Belt. The Site is not subject to any further designations or allocations.

4.2.6 Policy SP5 'Countryside and Green Belt' sets out that development proposals in the Green Belt will only be permitted where they would not result in inappropriate development or where very special circumstances have been demonstrated. Firstly, the Proposed Development is required in this location to connect the approved Priory Farm Solar Array to the electrical grid, at the grid connection point offered to the Applicant by National Grid. This planning application brings forward an amended grid



connection route, to replace the grid connection cable route previously approved as part of the wider scheme (application ref: 21/03380/FP), with the aim of reducing disruption during construction by avoiding the need for full road closures (as set out in Section 1.0 of this Planning Statement). Both the approved and amended grid connection cable route are located partly within the Green Belt. Furthermore, it is important to note that no above ground development is proposed. Therefore, once installed, the underground cables would not be visible and would not have any impact on the character or beauty of the countryside of Green Belt in this location. As such, the Proposed Development is considered to accord with Policy SP5.

4.2.7 Policy SP11 'Natural Resources and Sustainability' sets out that the Plan seeks to meet the challenges of climate change and flooding by (amongst others) "*Support proposals for renewable and low carbon energy development in appropriate locations.*" The Proposed Development is an essential component of the approved Priory Farm Solar Array scheme which would deliver renewable and low carbon energy. The Priory Farm Solar Array scheme, which included for a grid connection cable to Wymondley Substation, was allowed on appeal following a public inquiry on the 11th March 2024 (appeal reference: APP/X1925/V/23/3323321). Thus, has been proven to be located within an appropriate location. In light of the foregoing, it is considered that the Proposed Development is supported by Policy SP11.

4.2.8 Policy NE12 'Renewable and Low Carbon Energy Development' sets out that proposals for renewable and low carbon energy development which would contribute towards reducing greenhouse gas emissions will be permitted subject to an assessment of the impacts upon landscape and visual, environmental assets, the historic environment, transport, air quality, aviation and the amenity of residents. In assessing renewable and low carbon energy proposals the Council will give significant weight to their local and wider benefits, particularly the potential to reduce greenhouse gas and other harmful emissions. As identified within the assessment of Policy SP11 above, the Proposed Development is an essential component of the approved Priory Farm Solar Array scheme which would deliver renewable and low carbon energy. The revised grid connection cable is proposed to replace the grid connection cable approved as part of the original consent, to avoid the need for full road closures during construction to minimise disruption to the local community, which was identified as a local concern during the Priory Farm Solar Array public inquiry. In addition, the Proposed Development would be wholly underground and therefore would not result in any landscape and visual or aviation effects, nor would



it give rise to any material air quality effects. Furthermore, for the reasons set out within Section 3.0 of this report, the Proposed Development would not result in any unacceptable adverse impacts on environmental assets, the historic environment, transport or the amenity of residents. It is therefore considered that the Proposed Development is supported by Policy NE12.

4.2.9 For the reasons set out within Section 3.0 above, the Proposed Development is also considered to accord with:

- Policy SP1: Sustainable Development in North Hertfordshire;
- Policy SP6: Sustainable Transport;
- Policy SP12: Green Infrastructure, Landscape and Biodiversity;
- Policy SP13: Historic Environment;
- Policy T1: Assessment of Transport Matters;
- Policy NE2: Landscape;
- Policy NE4: Biodiversity and Geological Sites;
- Policy NE7: Reducing Flood Risk;
- Policy HE1: Designated Heritage Assets;
- Policy HE3: Non-Designated Heritage Assets; and
- Policy HE4: Archaeology.

Wymondley Parish Neighbourhood Plan (September 2019)

4.2.10 Policy GB1 'Green Belt' sets out that development proposals within the Green Belt must comply with national Government Green Belt policy. Furthermore, development proposals should not impact negatively on Wymondley Parish, particularly in terms of visual impact on the openness of the Green Belt landscape and its important contribution to the character of surrounding villages / hamlets. As set out within the assessment of Policy SP5 of the NHLP, the Proposed Development, once installed, would be located wholly underground and therefore would not be visible. As such, the Proposed Development would not impact negatively on Wymondley Parish in terms of visual impact, on the openness of the Green Belt, or on the character of surrounding settlements. The Proposed Development is therefore considered to accord with Policy GB1.

4.2.11 For the reasons set out within Section 3.0 above, the Proposed Development is also considered to accord with:



- Policy NHE1: Landscape Character;
- Policy NHE2: Biodiversity;
- Policy NHE3: Wildlife and Ecology;
- Policy NHE9: Historic Character and Heritage Assets;
- Policy FR1: Flood Risk; and
- Policy TM1: Roads.

4.3 Material Considerations

- 4.3.1 As set out previously within this Planning Statement, it is clearly the case that the proposal has environmental, economic and social benefits, and can therefore be described as sustainable development. In addition, the Proposed Development is an essential component of the approved Priory Farm Solar Array scheme, which would assist the UK in achieving its renewable energy targets in accordance with the NPPF, as well as its net zero target by 2050.
- 4.3.2 It is also important to note that within the proposed reforms to the NPPF published in July 2024 (under consultation until September 2024), it is identified that local planning authorities should *“give significant weight to the proposal’s contribution to renewable energy generation and a net zero future”*.
- 4.3.3 Furthermore, NHDCs declaration of a Climate Emergency on 21st May 2019¹ is considered to be a significant material consideration. The Council subsequently published their Climate Change Strategy 2021-2026 in 2022. As part of the Climate Change Strategy, the Council set the ambitious objective of achieving net zero across the District by 2040 which goes beyond Government targets, where net zero is targeted nationally by 2050. The Proposed Development, which is an essential component of the approved Priory Farm Solar Array scheme, would directly assist in achieving net zero by delivery zero carbon energy to the grid.

¹ <https://www.north-herts.gov.uk/home/council-data-and-performance/policies/climate-change>

4.4 Findings of the Planning Appraisal

- 4.4.1 The planning appraisal has shown that the Proposed Development accords with the relevant policies of the statutory Development plan and supports the delivery of low carbon energy in line with national policy.



5.0 SUMMARY AND CONCLUSION

- 5.1.1 This Planning Statement supports a detailed planning application which has been submitted to NHDC by AGR Solar 4 Limited (the Applicant), for the development of an electrical connection between the approved Priory Farm Solar Array and National Grid's Wymondley Substation, Hertfordshire.
- 5.1.2 Planning permission for the Priory Farm Solar Array was resolved to be granted by NHDC (application reference: 21/03380/FP) on 22nd November 2022 but the application was called-in by the Secretary of State (SoS) for determination. Following a call-in inquiry the development was approved on 11th March 2024 (appeal reference: APP/X1925/V/23/3323321).
- 5.1.3 The Priory Farm Solar Array scheme included for a grid connection cable to National Grid's Wymondley Substation, via Graveley Lane, Priory Lane, Stevenage Road and Blakemore End Road. During the public inquiry, concerns were raised with regards to the construction of the cable route, specifically with regards to road closures and traffic management. Ultimately, the potential impacts associated with the construction of the approved cable route were deemed acceptable and the application allowed. Nevertheless, the Applicant is still cognisant of local concerns. This planning application is therefore being brought forward for an amended grid connection cable route, which would omit Priority Lane, Blakemore End Road and Sperberry Hill from the route. Thus, avoiding road closures altogether and resulting in considerably less disruption during construction.
- 5.1.4 The cable route would be primarily laid within a mechanically excavated trench, with HDD and hand digging techniques used in more sensitive locations. The cable route would run through a variety of land uses including public highway, road verge, footpaths, greenfield land, agricultural fields, woodland, as well as crossing the Ash Brook watercourse.
- 5.1.5 The Proposed Development is an essential component of the approved Priory Farm Solar Array scheme, which would assist the UK in achieving its renewable energy targets and net zero target by 2050, in accordance with national policy and strategy. Accordingly, the Proposed Development clearly aligns with the principles of sustainable development and benefits from a presumption in its favour.



- 5.1.6 The Site is located partially within the Little Wymondley Settlement Boundary, with the remainder located within the Green Belt. No above ground development is proposed. It is therefore concluded that the Proposed Development would not have any impact on the Green Belt.
- 5.1.7 It has been recognised that the Proposed Development has the potential to affect flood risk, ecology and biodiversity, trees, heritage assets, as well as traffic and transport. All matters have been considered and assessed in detail as part of this planning application and it has been concluded that no unacceptable adverse impacts would occur, subject to appropriate mitigation measures.
- 5.1.8 The planning appraisal has shown that the Proposed Development fully accords with the policies of the statutory Development Plan and supports the delivery of low carbon energy, in line with national policy. Planning permission should therefore be granted without delay.